

REMARKS

This application has been carefully reviewed in light of the Office Action dated September 13, 2005 ("Office Action"). Claims 1 to 38 are presented for examination, of which Claims 1, 34, and 35 are independent. Reconsideration and further examination are respectfully requested.

Applicants thank the Examiner for the courtesies and thoughtful treatment afforded to Applicants' representative during the November 1, 2005, telephonic interview with the Examiner. Applicants submit that the forgoing amendments and following remarks accurately reflect the substance of the interview.

Turning to the Office Action, Claims 1 to 38 were rejected under 35 U.S.C. § 103(a), primarily over U.S. Patent 5,218,455 ("Kristy") in view of U.S. Patent 5,590,284 ("Crosetto") and "Using MPI-Portable Parallel Programming with the Message-Passing Interface" ("Gropp"). In rejecting certain ones of the dependent claims, the Office Action additionally relied on one or more of the following patents: U.S. Patent 6,031,976 ("Koakutsu"); U.S. Patent 5,764,870 ("Manico"); U.S. Patent 5,930,465 ("Bellucco"); U.S. Patent 6,289,416 ("Fukushima"); U.S. Patent 6,421,782 ("Yanagisawa"); "Inside Adobe Photoshop" by Bouton, et al. ("Bouton"); U.S. Patent 6,085,195 ("Hoyt"); U.S. Patent 5,949,411 ("Doerr"). The rejections are respectfully traversed because any permissible combination of the cited references would fail to disclose or to suggest all of the features of the present invention, and in particular, would fail to disclose or to suggest at least the features of a scanner connected to a dedicated computer by a first high-speed image data interface bus and an image-recorder connected to the dedicated computer by a second

high-speed image data interface bus different from the first high-speed image data interface bus.

Independent Claim 1 recites a method for authoring a plurality of digital image records, each digital image record corresponding to a separate customer order, in a digital image record authoring system including a dedicated computer. The method comprises a scanning step, a processing step, and a writing step. The scanning step scans a plurality of images corresponding to a separate customer order from a scanner into a plurality of digital images. The scanner is connected to the dedicated computer by a first high-speed image data interface bus. The processing step processes the plurality of digital images and combines the processed plurality of digital images into a record image. The writing step writes the record image by an image-recorder to a medium. The image-recorder is connected to the dedicated computer by a second high-speed image data interface bus different from the first high-speed image data interface bus. The scanning step is repeated, prior to completion of the writing step, to scan a new plurality of images corresponding to a new customer order from the scanner into a new plurality of digital images, such that transfer of the new plurality of digital images over the first high-speed image data interface bus and transfer of the record image over the second high-speed image data interface bus occur simultaneously.

Independent Claim 34 defines a method similar to Claim 1, including the features of a scanner connected to a dedicated computer by a first high-speed image data interface bus and an image-recorder connected to the dedicated computer by a second high-speed image data interface bus different from the first high-speed image data interface

bus. Claim 34 also specifies that the record image, which is passed from the dedicated computer to the image-recorder, is passed at a constant rate. Independent Claim 35 includes a scanning step, an adjusting step, a generating step, a processing step, and a CD-writing step, and also includes the features of a scanner connected to a dedicated computer by a first high-speed image data interface bus and an image-recorder connected to the dedicated computer by a second high-speed image data interface bus different from the first high-speed image data interface bus.

The applied art is not seen to disclose or suggest the features of independent Claims 1, 34, and 35, and in particular, is not seen to disclose or suggest at least the features of a scanner connected to a dedicated computer by a first high-speed image data interface bus and an image-recorder connected to the dedicated computer by a second high-speed image data interface bus different from the first high-speed image data interface bus.

The Office Action concedes that Kristy does not disclose that the image-recorder is connected to the dedicated computer by a second interface bus different from the first interface bus. (Office Action page 4). To address this deficiency of Kristy, the Office Action relies on Crosetto. Specifically, the Office Action contends that Crosetto discloses separate interface buses (FIG. 1 (10, 12, 14) of Crosetto, hereinafter "serial links"), and that Crosetto's bus configuration would suggest to a person skilled in the art to use separate buses in Kristy for a scanner interface bus and an image-recorder interface bus.

Applicants respectfully submit that Crosetto teaches away from the combination recited in the Office Action for the reasons discussed below. While some form of combination of Kristy and Crosetto might be possible, contrary to the Office Action's assertion Crosetto clearly motivates the use of a single bus for a scanner interface and an image-recorder interface.

Crosetto relates to a real-time high density data communication system to control transmission of data among processor nodes over a parallel communication network by sending commands from the master processor node to slave processor nodes over a serial communication network. (column 2, line 51 to column 3, line 2 of Crosetto). Crosetto discloses processor nodes (FIG. 1 (100, 200, 202, 204)) connected with serial links (FIG. 1 (10, 12, 14)), which form the serial communication network. (See FIG. 6 (810) of Crosetto). Each node is also connected to a single parallel data bus (FIG. 1 (30, 40, 50, 60)), for the transfer of data to be processed by the node over the parallel communication network. (See FIG. 6 (900) of Crosetto).

The Office Action takes the position that it would have been obvious, based on Crosetto's disclosure of serial links 10, 12, and 14, to use separate interface buses in Kristy for the transfer of image data from the scanner to the host computer and from the host computer to the CD recorder. However, Crosetto teaches away from such a combination because Crosetto requires "the serial links are dedicated solely to the transfer of control signals," whereas a "fast parallel channel is dedicated solely to the transfer of data." (column 4, lines 13 to 17). In particular, Crosetto emphasizes that the advantages of the system result from sending the command and control data flow over the serial links and

sending high density data to be processed by the nodes over a high speed parallel communication network. (See column 2, line 57 to column 3, line 7; column 3, lines 52 to 63; and column 4, lines 13 to 36). Thus, even if a combination of Kristy and Crosetto were possible, Crosetto clearly teaches away from utilizing a communication network such as serial links 10, 12, and 14 for the transfer of image data.

On the contrary, Crosetto discloses that "all high density data arrives or leaves the node" through a single parallel bus. (column 9, lines 20 to 22). Specifically, "[t]he flow of data into a node is from the fast parallel hardware channel 70 . . . for subsequent access by the transputer 104," and the processed data "flows out of the node . . . to the fast parallel hardware channel 70 to its final destination at one or more other nodes." (column 8, line 51 to column 9, line 1). Therefore, assuming a combination of Kristy and Crosetto were possible, Crosetto clearly motivates the use of a single bus for a scanner interface and an image-recorder interface.

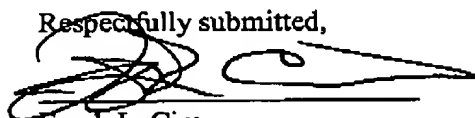
Accordingly, independent Claims 1, 34 and 35 are believed to be allowable over the applied references.

The other claims in the application are each dependent from the independent claims and are believed to be allowable over the applied references for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

No other matters being raised, it is believed that the entire application is fully in condition for allowance, and such action is courteously solicited.

Applicants' undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



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